## EXHIBIT A

**Proposed Form of Order** 

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	)	Chapter 7
BENEFITS DATA TRUST,	)	Case No. 24-13656-AMC
	Debtor. )	

## ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF DUANE MORRIS LLP AS COUNSEL TO THE CHAPTER 7 TRUSTEE PURSUANT TO 11 U.S.C. § 327(A)

Upon consideration of the Application for Entry of an Order Authorizing the Employment and Retention of Duane Morris LLP as Counsel to the Chapter 7 Trustee Pursuant to 11 U.S.C. § 327(a) (the "Application") filed by Lynn E. Feldman, Esquire (the "Trustee"), chapter 7 trustee in the above-captioned chapter 7 case; and upon consideration of the Declaration of Lawrence J. Kotler filed in support of the Application (the "Kotler Declaration"); and the Court being satisfied based on the representations made in both the Application and the Kotler Declaration that Duane Morris LLP is "disinterested" as that term is defined in 11 U.S.C. § 101(14); and it appearing that the relief requested in the Application is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and it appearing that this Court has jurisdiction over this matter; and it appearing that the Application is a core proceeding; and adequate notice of the Application and opportunity for objection having been given; and it appearing that no other notice need be given; and after due deliberation and sufficient cause therefor, it is hereby:

- 1. **ORDERED** that the Application is approved; and it is further
- 2. **ORDERED** that in accordance with 11 U.S.C. § 327(a) and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure, the Trustee is authorized to employ and retain Duane

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Morris LLP as her counsel under the terms set forth in the Application and the Kotler Declaration; and it is further

3. **ORDERED** that compensation shall be paid to Duane Morris LLP as an administrative expense in such amounts as the Court may hereafter determine and allow; and it is further

4. **ORDERED** that this Court retains jurisdiction with respect to all matters arising from or related to the implementation of this order.

Dated:	, 2024	BY THE COURT:
		HONORABLE ASHELY M. CHAN,
		CHIEF UNITED STATES BANKRUPTCY JUDGE

CC:

Lynn E. Feldman, Esquire Feldman Law Offices, PC 2310 Walbert Avenue Suite 103 Allentown, PA 18104

Duane Morris LLP Attn: Lawrence J. Kotler, Esq. 30 South 17th Street Philadelphia, PA 19103-4196

United States Trustee Office of United States Trustee 900 Market Street, Suite 320 Philadelphia, PA 19107